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June 13, 2025

Auditing Standards Board
American Institute of Certified Public Accountants
1211 Avenue of the Americas, 19th Floor
New York, NY 10036

Via email to commentletters@aicpa-cima.com and online at [Qualtrics Survey](#)

Re: Proposed ASB Strategic Plan 2026–2030, AICPA Auditing Standards Board

RSM US LLP (RSM) appreciates the opportunity to comment on the American Institute of Certified Public Accountants (AICPA) Auditing Standards Board's (ASB) Proposed Strategic Plan 2026–2030. RSM is a leading provider of audit, tax and consulting services focused on the middle market.

Overall, we are supportive of the ASB's Strategic Plan 2026-2030. As requested, we have the following general feedback and specific responses on the aspects of the proposed strategy upon which the Auditing Standard Board (the Board) is seeking feedback.

Comments on Specific Questions

1. Do you agree with "Our Mission and Keys to Our Success"?

Agree, with comments

"Our Mission" section

We agree with the context of ASB's mission statement, especially the inclusion of the description of public interest, and the overall keys to success to inspire public trust, specifically to the external reporting users, in the results of the services performed under the professional standards. We believe these paragraphs are helpful and on-point.

"Keys to Our Success" section

We would like to recommend that the first bullet within the "Keys to Our Success" section be stronger in tone and clearer about how the profession will work in the public interest and honor the public trust. The key to success in instilling and maintaining public trust is through accountability and transparency about how the audit profession conducts its work.

To achieve this, we would recommend expanding the descriptions (**see bolded type for additions**) in the "Keys to Our Success" to help further understanding of the mission and instill public trust.

- Developing and updating auditing, attestation, and quality management standards that inspire public trust **through transparency in process; intent; and providing timely communication for the** related changes and implications to stakeholders, including practitioners, external reporting users and others.
- Responding timely to the need for clear **supplemental** guidance for practitioners in relation to our auditing, attestation, and quality management standards. This includes considering the enhancement of the quality of our standards and the continued ability of our standards to be effectively scalable **and effectively and consistently** implemented and applied.

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- Contributing to, and drawing from, the development of high-quality international auditing and assurance standards and guidance issued by the International Auditing and Assurance Standards Board (IAASB) and acting in dialogue with the standard-setting work of other U.S. standard setters, such as the PCAOB and the Government Accountability Office (GAO).

2. Do you agree with the “Factors Driving Our Strategy”?

Agree, with comments

In “Evolving technology landscape,” we would like the ASB to recognize the challenges posed by advanced technology tools, such as artificial intelligence (AI), in audit and attestation engagements. The increasing complexity and implications of these technologies require careful consideration to ensure effective and accurate auditing practices. Therefore, we would like the ASB to revise the second bullet in this section to recognize artificial intelligence (addition noted in **bold**): “Rapid developments in technologies are having a profound effect on audit and attestation engagements, including technology-assisted procedures, **like artificial intelligence**, and changes in how engagement teams are structured and interact.”

3. Do you agree with “Our Strategic Initiatives”?

Agree, with comments

We find the graphic representation of “Our Strategic Initiatives” to be helpful in understanding how the ASB achieves its mission. The ordering of the initiatives is very sensical, starting with an external focus on public interest and moving to a more internal, professional view.

4. Do you agree with “Our Strategic Actions”?

Agree, with comments

We agree with the proposed strategic actions. However, we have some specific recommendations on Initiative B.

We propose rewording the third bullet, “Invest further in using technology and empirical research methods to obtain input and feedback on our projects and other activities,” as we believe it is unclear in why it falls under this initiative that is focused on communications. The bullet point as it is written appears to focus on investing further in technology and research, rather than communications. Accordingly, we recommend revising the bullet to read, “Increase input and feedback obtained on our projects and other activities by investing further in using technology and empirical research methods.”

Similarly, we propose rewording the fifth bullet to read, “Provide stakeholders with easier access to information by exploring enhancements and updates to our web page on the AICPA website.”

5. What topics do you believe should be at the forefront of our standard-setting agenda to achieve our mission and succeed in our strategic initiatives over the next five years?

We support the ASB's current standard-setting agenda and the prioritization, specifically for the following topics:

- Use of technology in the audit
- Completing sustainability attestation standards
- Risk response

6. Are there any other considerations that we should address related to our strategy?

We do not have any other suggestions for considerations related to strategy at this time.

We appreciate this opportunity to provide feedback on the ASB's Proposed Strategic Plan 2026–2030 and would be pleased to respond to any questions you may have about our comments. Please direct any questions regarding this letter to Lauren Horneff, Senior Manager—National Professional Standards Group, at 202.629.5171 or Sara Lord, Chief Auditor, at 612.376.9572.

Sincerely,

RSM US LLP

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